

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 23-00249
Jeffrey M. Garber	:	Chapter 13
	:	Judge Henry W. Van Eck
Debtor(s)	:	*****
	:	
Jeffrey M. Garber	:	Date and Time of Hearing
Jack N Zaharopoulos	:	_____
	:	
Movant,	:	Related Document No.
vs	:	
	:	
Nationstar Mortgage LLC d/b/a Mr.	:	
Cooper	:	
	:	
Respondents.	:	

**OBJECTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER TO THE
CONFIRMATION OF THE PLAN (DOCKET NUMBER 13)**

Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Jeffrey M. Garber ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 400-404 Moul Ave, Hanover, PA 17331-1565 ("Property").
2. Creditor intends to file a Proof of Claim that includes a pre-petition arrearage.
3. Debtor's Plan does not provide for the arrearage due on Creditor's claim.
4. At this time, Creditor has not offered a permanent loan modification agreement to Debtor.
5. Furthermore, Debtor's plan contemplates sale of the Property by February 6, 2024.

Creditor states that until sale of the Property is finalized, Debtor should make payments towards the prepetition arrearage.

23-003210_ABH

6. Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Adam B. Hall

Alyk L. Oflazian, Esquire (312912)

Adam B. Hall (323867)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

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Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

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	:	
Nationstar Mortgage LLC d/b/a Mr.	:	
Cooper	:	
	:	
Respondents.	:	

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of Nationstar Mortgage LLC d/b/a Mr. Cooper to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos, Chapter 13 Trustee, info@pamd13trustee.com

Paul Donald Murphy-Ahles, Attorney for Jeffrey M. Garber, pmurphy@dplglaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Jeffrey M. Garber, 56 Thomas Drive, Mc Sherrystown, PA 17344

/s/ Adam B. Hall _____

23-003210_ABH

MANLEY DEAS KOCHALSKI LLC
P.O. BOX 165028
COLUMBUS OH 43216-5028

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